

**LISA A. BRYANT,**

V.

Defendants.

:  
:  
:  
: Case No.: 2:20-cv-00594-JAD-EJY  
:  
:  
:  
:  
:  
:  
:  
: ~~[PROPOSED]~~ STIPULATION AND  
: ORDER TO EXTEND DISCOVERY  
:  
:  
: [FIRST REQUEST]

### 1. Completed Discovery.

## 2. Remaining Discovery.

- 1 -

1                                   **3. Good Cause.**

2

3           On October 5, 2020, Defendants filed a Motion for Extension of Time to Responds to

4   Discovery Requests (“Motion for Extension”) because Defendants are working remotely and on a

5   reduced staff due to the Covid 19 pandemic. *See* ECF No. 25. On October 21, 2020, the Court

6   granted Defendants’ Motion for Extension and Defendants’ discovery responses are now due on

7   November 4, 2020. *See* ECF No.26.

8           Thus, the parties are seeking a 90-day extension to ensure that the pending discovery can

9   be completed without requesting additional time. This stipulation is made in good faith, is not

10   interposed for delay, and is not filed for an improper purpose. Furthermore, a trial date has not

11   been set at this time.

12                                   **5. Current Discovery Deadlines.**

- 13                                   • Discovery Cutoff: **January 5, 2021**
- 14                                   • Deadline to Amend Pleadings: **October 7, 2020**
- 15                                   • Deadline to Disclose Initial Expert Disclosures: **November 6, 2020**
- 16                                   • Deadline to Disclose Rebuttal Expert Disclosures: **December 7, 2020**
- 17                                   • Dispositive Motion Deadline: **February 4, 2021**
- 18                                   • Joint Proposed Pretrial Order: **March 8, 2021**

19                                   **6. Proposed Discovery Deadlines.**

- 20                                   • Discovery Cutoff: **April 5, 2021**
- 21                                   • Deadline to Amend Pleadings: **January 7, 2021**
- 22                                   • Deadline to Disclose Initial Expert Disclosures: **February 6, 2021**
- 23                                   • Deadline to Disclose Rebuttal Expert Disclosures: **March 7, 2021**
- 24                                   • Dispositive Motion Deadline: **May 4, 2021**
- 25                                   • Joint Proposed Pretrial Order: **June 8, 2021**

26

27           WHEREAS, no prejudice will occur to this Court or the Parties if granted, good cause

28   supports this request to extend discovery;

1 NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS  
2 HEREBY STIPULATED AND AGREED, by and between the Parties as follows:

3 The August 19, 2020 Scheduling Order shall be amended as follows:

- 4 • Discovery Cutoff: **April 5, 2021**
- 5 • Deadline to Amend Pleadings: **January 7, 2021**
- 6 • Deadline to Disclose Initial Expert Disclosures: **February 6, 2021**
- 7 • Deadline to Disclose Rebuttal Expert Disclosures: **March 7, 2021**
- 8 • Dispositive Motion Deadline: **May 4, 2021**
- 9 • Joint Proposed Pretrial Order: **June 8, 2021**

10 **IT IS SO STIPULATED.**

11  
12 DATED: October 25, 2020

DATED: October 25, 2020

13 FREEDOM LAW FIRM, LLC

WALDMAN & PORRAS, PLLC

14  
15 By: /s/ George Haines

By: /s/ Nicholas M. Porras

16 GEORGE HAINES, ESQ.  
17 Nevada Bar No.: 9411  
18 8985 S. Eastern Ave., Suite 350  
19 Las Vegas, NV 89123  
Attorney for Plaintiff  
LISA BRYANT

NICOLAS M. PORRAS, ESQ.  
Nevada Bar No.: 12849  
201 West Liberty Street, Suite 207  
Reno, NV 89501  
Attorney for Defendants  
MADISON MANAGEMENT SERVICES,  
LLC, AND PORRAS, PLLC

**ORDER GRANTING**

**STIPULATION TO EXTEND DISCOVERY**

In consideration of the parties' stipulation and good cause showing, **IT IS ORDERED**  
**THAT** the August 19, 2020 Scheduling Order shall be amended as follows:

- Discovery Cutoff: **April 5, 2021**
- Deadline to Amend Pleadings: **January 7, 2021**
- Deadline to Disclose Initial Expert Disclosures: **February 6, 2021**
- Deadline to Disclose Rebuttal Expert Disclosures: **March 7, 2021**
- Dispositive Motion Deadline: **May 4, 2021**
- Joint Proposed Pretrial Order: **June 8, 2021**

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

Dated: October 27, 2020